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COMPLEX PROBLEMS. INNOVATIVE SOLUTIONS.

October 16, 2017

OTC Markets Group, Inc.
304 Hudson Street, 2nd Floor
New York, NY 10013

Re: ReelTime Rentals, Inc. (RLTR) – OTC Markets Group Attorney
Letter

Dear Sir:

The undersigned is a citizen and resident of the United States and has acted as counsel to ReelTime Rentals, Inc., a Washington corporation (the “Company” or “RLTR”) in regard to general business matters, corporate governance and securities compliance. As regular disclosure counsel to the Company, I have been requested to render this opinion letter to you. In connection therewith, the OTC Markets Group, Inc. is entitled to rely on the contents of this letter in determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended.

The undersigned has examined such corporate records and other documents and such questions of law as considered necessary or appropriate for purposes of rendering this letter. For purpose of this letter, I have assumed (1) the genuineness of all signatures and the authenticity and completeness of all corporate records, certificates of officers, certificates of public officials, and other documents and instruments submitted to me as originals; (2) the conformity of authentic originals of all corporate records, certificates of officers, certificates of public officials, and other documents and instruments submitted to me as certified, conformed, photo static or facsimile copies thereof; and (3) the accuracy and adequacy of disclosures made by the Company, the Company’s management and the Company’s Board of Directors including, without limitation, the financial information contained in the Information (as defined below). I have no reason to believe that such records, certificates and other documents are not accurate, authentic or reliable.

In connection with this letter, I have reviewed the following Company filings (the “Information”) published on the OTC Disclosure and News Service or otherwise available to me:

(a) The Company’s Quarterly Report for the period ended June 30, 2017, as published through the OTC Disclosure and News Service on October 6, 2017.

(b) The Company's Quarterly Report for the period ended March 31, 2017, as published through the OTC Disclosure and News Service on September 25, 2017.

(c) The Company's Annual Report for the year ended December 31, 2016 (the "2016 Annual Report"), as published through the OTC Disclosure and News Service on March 14, 2017.

(d) The Company's Quarterly Report for the period ended September 30, 2016, as published through the OTC Disclosure and News Service on November 14, 2016.

(e) The Company's Quarterly Report for the period ended June 30, 2015, as published through the OTC Disclosure and News Service on October 24, 2016.

(f) The Company's Quarterly Report for the period ended March 31, 2015, as published through the OTC Disclosure and News Service on October 24, 2016.

(g) The Company's Annual Report for the year ended December 31, 2015 (the "2015 Annual Report"), as published through the OTC Disclosure and News Service on October 24, 2016.

In addition to the foregoing Information, I have reviewed the following additional Company documents:

(a) The Company's Articles of Incorporation as filed on June 24, 2004 with the Washington Secretary of State;

(b) The Company's Articles of Amendment as filed on November 1, 2007, May 13, 2009, November 23, 2015, April 28, 2016 and May 3, 2016 with the Washington Secretary of State; and

(c) The Settlement Agreement dated February 19, 2016 entered into by the Company, James C. Hodge, Atom Miller, Bellatora LLC and Hall of Fame Beverages, Inc. and the various documents and/or instruments related thereto including, without limitation, corporate minutes, promissory note, guaranty, assignments and other pertinent documents.

In issuing this letter, I represent as follows:

1. The Company's Information (i) constitutes "adequate current public information" concerning the Company and its securities and "is available" within the meaning of Rule 144(c)(2) under the Securities Act; (ii) includes all of the information that a broker-dealer would be required to obtain from Company to publish a quotation for the Company securities under Rule 15c2-11 of the Securities Exchange Act of 1934, as amended (the "Exchange Act"); (iii) complies as to the form of the OTC Markets Group,

Inc.'s Pink Basic Disclosure Guidelines, which are located on the Internet at www.otcmarkets.com; and (iv) has been posted through the OTC Disclosure and News Service.

2. The financial statements of the Company contained in the 2016 Annual Report were not audited and were prepared by Rick Basse, a certified public accountant since 1985 whose office is located in New Braunfels, Texas. Mr. Basse has more than 25 years experience in SEC and financial reporting, financial analysis and management and information technology and controls for diverse organizations. Mr. Basse graduated in 1983 from Texas Lutheran College located in Seguin, Texas with a BBA degree (cum laude).

3. The Company's transfer agent (the "Transfer Agent") is Pacific Stock Transfer, Inc. with offices located at 6725 Via Austi Parkway, Suite 300, Las Vegas, Nevada 89119, telephone no.: (702) 361-3033. The Transfer Agent is registered with the Securities and Exchange Commission. The method used by counsel to confirm the number of outstanding common shares set forth in the 2016 Annual Report was by reviewing a report from the Transfer Agent confirming the Company's share structure effective as of December 31, 2016.

4. I have (i) met with management of the Company either personally or via video conference, (ii) reviewed the 2016 Annual Report published by the Company through the OTC Disclosure and News Service; and (iii) discussed the 2016 Annual Report with management and a majority of the directors of the Company.

5. To the best of my knowledge, after inquiry of management and the Board of Directors of the Company, neither the Company, nor any of its officers and/or directors, nor any 5% shareholder, nor counsel is currently under investigation by any Federal or State regulatory authority for any violation of federal or state securities laws.

The representations made by the undersigned in this letter are expressed as of the date hereof and remain valid so long as the documents, instruments, records and certificates I have examined and relied upon, as noted above, are unchanged and the assumptions I have made, as noted above, are valid. Any obligation is hereby disclaimed to update or supplement this letter to reflect any facts or circumstances that may hereafter come to the undersigned's attention or any changes in law that may hereafter occur or which occurred prior to the date hereof, the occurrence of which the undersigned has no knowledge.

This letter may be relied upon only by OTC Markets Group and may not be relied upon by any other person or entity without my prior written consent. However, I hereby grant OTC Markets Group, Inc. full and complete permission and right to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators.

OTC Markets Group, Inc.

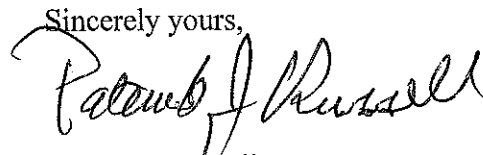
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The undersigned is admitted to practice law in the State of Colorado and before all Federal and state courts in Colorado. I am permitted to practice before the Securities and Exchange Commission and have not been prohibited from practice thereunder.

If there are any questions or comments concerning the matters set forth herein, please advise.

Sincerely yours,

A handwritten signature in black ink that reads "Patrick J. Russell". The signature is written in a cursive style with a large initial "P" and "R".

Patrick J. Russell

PJR:pjr